

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE BENCHMARK
RATES ANTITRUST LITIGATION

C.A. No. 1:13-cv-7789-LGS

**CLASS PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF FIFTEEN
SETTLEMENT AGREEMENTS AND PLAN OF DISTRIBUTION**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 23(e), this Court's Orders Preliminarily Approving Settlements (ECF Nos. 536, 866, 882) and Superseding Order Approving the Form and Manner of Notice of Settlement, and Preliminarily Approving the Plan of Distribution (ECF No. 883), and upon the accompanying memorandum of law; the Declarations of Christopher M. Burke and Michael D. Hausfeld; Kenneth R. Feinberg; Sandra Adams; Stephen J. Cirami; Patricia Corley; Abigail Deering; Jessy Hong; Tomasz Karol Idzior; Michael T. Lee; Audrey Ng; Jason Rabe; and Patrick Shilling, the exhibits attached thereto, and the record herein, Plaintiffs Aureus Currency Fund, L.P.; the City of Philadelphia, Board of Pensions and Retirement; Employees' Retirement System of the Government of the Virgin Islands; Employees' Retirement System of Puerto Rico Electric Power Authority; Fresno County Employees' Retirement Association; Haverhill Retirement System; Oklahoma Firefighters Pension and Retirement System; State-Boston Retirement System; Syena Global Emerging Markets Fund, LP; Systrax Corporation; Tiberius OC Fund, Ltd.; United Food and Commercial

Workers Union and Participating Food Industry Employers Tri-State Pension Fund; Value Recovery Fund L.L.C.; J. Paul Antonello; Marc G. Federighi; Thomas Gramatis; Doug Harvey; Izee Trading Company; John Kerstein; Michael Melissinos; Mark Miller; Robert Miller; Richard Preschern d/b/a Preschern Trading; Peter Rives; Michael J. Smith; Jeffrey Sterk; and Kimberly Sterk (collectively, “Class Plaintiffs”) will respectfully move the Court, before the Honorable Lorna G. Schofield, United States District Judge at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on May 23, 2018 at 4:00 P.M., or such other location and time as set by the Court, for an Order approving the proposed Settlement Agreements with:

- (1) Bank of America Corporation, Bank of America, N.A., and Merrill Lynch, Pierce, Fenner & Smith Incorporated;
- (2) The Bank of Tokyo-Mitsubishi UFJ, Ltd.;
- (3) Barclays Bank PLC and Barclays Capital Inc.;
- (4) BNP Paribas Group, BNP Paribas North America Inc., BNP Paribas Securities Corp., and BNP Prime Brokerage, Inc.;
- (5) Citigroup Inc., Citibank, N.A., Citicorp, and Citigroup Global Markets Inc.;
- (6) Deutsche Bank AG;
- (7) The Goldman Sachs Group, Inc. and Goldman, Sachs & Co.;
- (8) HSBC Holdings PLC, HSBC Bank PLC, HSBC North America Holdings Inc., HSBC Bank USA, N.A., and HSBC Securities (USA) Inc.;
- (9) JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.;
- (10) Morgan Stanley, Morgan Stanley & Co. LLC, and Morgan Stanley & Co. International PLC;

(11) RBC Capital Markets LLC;

(12) The Royal Bank of Scotland Group PLC, The Royal Bank of Scotland PLC, and RBS Securities Inc.;

(13) Société Générale;

(14) Standard Chartered Bank; and

(15) UBS AG, UBS Group AG, and UBS Securities LLC;

and approving the proposed Plan of Distribution as fair, adequate, and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Plaintiffs' reply papers, after the deadlines for objecting to the Settlements and requesting exclusion from the Settlements Classes have passed.

DATED: January 12, 2018

SCOTT+SCOTT, ATTORNEYS AT LAW,
LLP

HAUSFELD LLP

s/ Christopher M. Burke

s/ Michael D. Hausfeld

CHRISTOPHER M. BURKE (CB-3648)
WALTER W. NOSS (WN-0529)
KRISTEN M. ANDERSON (*pro hac vice*)
STEPHANIE A. HACKETT (*pro hac vice*)
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: 619-233-4565
Facsimile: 619-233-0508
cburke@scott-scott.com
wnoss@scott-scott.com
kanderson@scott-scott.com
shackett@scott.scott.com

MICHAEL D. HAUSFELD
REENA A. GAMBHIR
TIMOTHY S. KEARNS
NATHANIEL C. GIDDINGS
SARAH R. LAFRENIERE
1700 K Street, NW, Suite 650
Washington, DC 20006
Telephone: 202-540-7200
Facsimile: 202-540-7201
mhausfeld@hausfeld.com
rgambhir@hausfeld.com
tkearns@hausfeld.com
ngiddings@hausfeld.com
slafreniere@hausfeld.com

-and-

SCOTT+SCOTT, ATTORNEYS AT LAW,
LLP

-and-

DAVID R. SCOTT (DS-8053)
JOSEPH P. GUGLIELMO (JG-2447)

DONALD A. BROGGI (DB-9661)
PETER A. BARILE III (PB-3354)
SYLVIA SOKOL (SS-0317)
THOMAS K. BOARDMAN (TB-0530)
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Telephone: 212-223-6444
Facsimile: 212-223-6334
david.scott@scott-scott.com
jguglielmo@scott-scott.com
dbroggi@scott-scott.com
pbarile@scott-scott.com
ssokol@scott-scott.com
tboardman@scott-scott.com

HAUSFELD LLP
MICHAEL P. LEHMANN
BONNY E. SWEENEY
CHRISTOPHER L. LEBSOCK
600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Telephone: 415-633-1908
Facsimile: 415-358-4980
mlehmann@hausfeld.com
bsweeney@hausfeld.com
clebsock@hausfeld.com

Interim Co-Lead Counsel

OBERMAYER REBMANN MAXWELL &
HIPPEL LLP
WILLIAM J. LEONARD (*pro hac vice*)
RIGEL FARR (*pro hac vice*)
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19103-1895
Telephone: 215-665-3000
Facsimile: 215-665-3165
william.leonard@obermayer.com
rigel.farr@obermayer.com

-and-

BONI & ZACK LLC
MICHAEL J. BONI (*pro hac vice*)
JOSHUA D. SNYDER (*pro hac vice*)
15 St. Asaphs Rd.
Bala Cynwyd, PA 19004
Telephone: 610-822-0200
Facsimile: 610-822-0206
mboni@bonizack.com
jsnyder@bonizack.com

*Counsel for Plaintiff the City of
Philadelphia, Board of Pensions and
Retirement*

KOREIN TILLERY, LLC
STEPHEN M. TILLERY (*pro hac vice*)
ROBERT L. KING (*pro hac vice*)
AARON M. ZIGLER (*pro hac vice*)
STEVEN M. BEREZNEY (*pro hac vice*)
One U.S. Bank Plaza
505 N. 7th Street, Suite 3600
Saint Louis, MO 63101-1612
Telephone: 314-241-4844
Facsimile: 314-241-3525
stillery@koreintillery.com
rking@koreintillery.com
azigler@koreintillery.com
sberezney@koreintillery.com

-and-

KOREIN TILLERY, LLC
GEORGE A. ZELCS (*pro hac vice*)
ROBERT E. LITAN
205 N. Michigan Ave, Suite 1950
Chicago, IL 60601-5927
Telephone: 312-641-9750
Facsimile: 312-641-9751
gzlcs@koreintillery.com
rlitan@koreintillery.com

WOLF POPPER LLP
MARIAN R. ROSNER
PATRICIA I. AVERY
FEI-LU QIAN
845 Third Avenue, 12th Floor
New York, New York 10022
Telephone: 212-759-4600
Facsimile: 212-486-2093
mrosner@wolfdopper.com
pavery@wolfdopper.com
fqian@wolfdopper.com

*Counsel for Plaintiff Employees' Retirement
System of Puerto Rico Electric Power
Authority*

LABATON SUCHAROW LLP
GREGORY S. ASCIOLLA
JAY L. HIMES
ROBIN A. VAN DER MEULEN
MATTHEW J. PEREZ
140 Broadway
New York, NY 10005
Telephone: 212-907-0700
Facsimile: 212-818-0477
gasciolla@labaton.com
jhimes@labaton.com
rvandermeulen@labaton.com
mperez@labaton.com

*Counsel for Plaintiff State-Boston
Retirement System, Marc G. Federighi, and
Michael J. Smith*

GRANT & EISENHOFER, P.A.
ROBERT G. EISLER
123 Justison Street
Wilmington, DE 19801
Telephone: 302-622-7030
Facsimile: 302-622-7100
reisler@gelaw.com

*Counsel for Plaintiff Syena Global
Emerging Markets Fund, LP*

ENTWISTLE & CAPPUCCI LLP

*Counsel for Plaintiffs Haverhill Retirement
System and Oklahoma Firefighters Pension
and Retirement System, Robert Miller, Mark
Miller, and Peter Rives*

ROBBINS GELLER RUDMAN & DOWD
LLP
PATRICK J. COUGHLIN
DAVID W. MITCHELL
BRIAN O. O'MARA
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619-231-1058
patc@rgrdlaw.com
davidm@rgrdlaw.com
bomara@rgrdlaw.com

*Counsel for Plaintiff Employees' Retirement
System of the Government of the Virgin
Islands*

BERMAN TABACCO
JOSEPH J. TABACCO, JR. (JJT-1994)
TODD A. SEAVER (*pro hac vice*)
SARAH KHORASANEE MCGRATH (*pro
hac vice*)
JESSICA MOY (*pro hac vice*)
44 Montgomery Street, Suite 650
San Francisco, CA 94104
Telephone: 415-433-3200
Facsimile: 415-433-6382
jtabacco@bermandevalerio.com
tseaver@bermandevalerio.com
smcgrath@bermandevalerio.com
jmoy@bermandevalerio.com

*Counsel for Plaintiff Fresno County
Employees' Retirement Association*

CRIDEN & LOVE, P.A.
MICHAEL E. CRIDEN
LINDSEY C. GROSSMAN
7301 SW 57th Court, Suite 515
South Miami, FL 33143
Telephone: 305-357-9000
Facsimile: 305-357-9050

ANDREW J. ENTWISTLE
VINCENT R. CAPPUCCI
ROBERT N. CAPPUCCI
299 Park Avenue, 20th Floor
New York, NY 10171
Telephone: 212-894-7200
Facsimile: 212-894-7272
aentwistle@entwistle-law.com
vcappucci@entwistle-law.com
rcappucci@entwistle-law.com

*Counsel for Plaintiffs Tiberius OC Fund,
Ltd. and Value Recovery Fund L.L.C.*

RADICE LAW FIRM, P.C.
JOHN RADICE
KENNETH PICKLE
34 Sunset Blvd.
Long Beach, NJ 08008
Telephone: 646-245-8502
Facsimile: 609-385-0745
jradice@radicelawfirm.com
kpickle@radicelawfirm.com

*Counsel for Plaintiffs Doug Harvey, Izee
Trading Company, and Richard Preschern
d/b/a Preschern Trading*

CERA LLP
SOLOMON B. CERA
C. ANDREW DIRKSEN
595 Market Street, Suite 2300
San Francisco, CA 94105
Telephone: 415-777-2230
Facsimile: 415-777-5189
scera@cerallp.com
cdirksen@cerallp.com

*Counsel for Plaintiff Aureus Currency Fund
L.P.*

FREED KANNER LONDON & MILLEN
LLC
MICHAEL J. FREED
STEVEN A. KANNER
2201 Waukegan Road, Suite 130

mcriden@cridenlove.com
lgrossman@cridenlove.com

*Counsel for Plaintiffs J. Paul Antonello,
Marc G. Federighi, and Michael J. Smith*

LOWEY DANNENBERG COHEN &
HART, P.C.
VINCENT BRIGANTI
GEOFFREY M. HORN
PETER D. ST. PHILLIP
RAYMOND P. GIRNYS
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: 914-733-7221
Facsimile: 914-997-0035
vbriganti@lowey.com
ghorn@lowey.com
pstphillip@lowey.com
rgirnys@lowey.com

-and-

LOWEY DANNENBERG COHEN &
HART, P.C.
GERALD LAWRENCE, ESQ.
Four Tower Bridge
200 Bar Harbor Drive, Suite 400
West Conshohocken, PA 19428
Telephone: 610-941-2760
Facsimile: 610-862-9777
glawrence@lowey.com

-and-

SHEPHERD, FINKELMAN, MILLER &
SHAH, LLP
ERIC. L. YOUNG
NATALIE FINKELMAN BENNETT
35 East State Street
Media, PA 19063
Telephone: 610-891-9880
Facsimile: 866-300-7367
eyoung@sfmslaw.com
nfinkelman@sfmslaw.com

Bannockburn, Illinois 60015
Telephone: 224-632-4500
Facsimile: 224-632-4521
mfreed@fklmlaw.com
skanner@fklmlaw.com

*Counsel for Plaintiffs Thomas Gramatis and
John Kerstein*

NUSSBAUM LAW GROUP, P.C.
LINDA P. NUSSBAUM
1211 Avenue of the Americas
New York, NY, 10036
Telephone: 917-438-9102
lnussbaum@nussbaumpc.com

*Counsel for Plaintiffs Jeffrey Sterk,
Kimberly Sterk, and Michael Melissinos*
MOGINRUBIN LLP
DANIEL J. MOGIN
JODIE M. WILLIAMS
707 Broadway, Suite 1000
San Diego, CA 92101
Telephone: 619-687-6611
Facsimile: 619-687-6610
dmogin@moginlaw.com
jwilliams@moginlaw.com

-and-

STEYER LOWENTHAL BOODROOKAS
ALVAREZ & SMITH LLP
ALLAN STEYER
JAYNE PEETERS
One California Street, Third Floor
San Francisco, CA 94111
Telephone: 415-421-3400
Facsimile: 415-421-2234
asteyer@steyerlaw.com
jpeeters@steyerlaw.com

*Counsel for Plaintiffs Haverhill Retirement
System and Oklahoma Firefighters Pension
and Retirement System*

-and-

SHEPHERD, FINKELMAN, MILLER &
SHAH, LLP
JAMES E. MILLER
65 Main Street
Chester, CT 06412
Telephone: 860-526-1100
Facsimile: 860-526-1120
jmiller@sfmslaw.com

-and-

RADICE LAW FIRM, P.C.
JOHN RADICE
KENNETH PICKLE
34 Sunset Blvd.
Long Beach, NJ 08008
Telephone: 646-245-8502
Facsimile: 609-385-0745
jradice@radicelawfirm.com
kpickle@radicelawfirm.com

-and-

MANDEL BHANDARI LLP
RISHI BHANDARI
EVAN MANDEL
80 Pine Street, 33rd Floor
New York, NY 10005
Telephone: 212-269-5600
Facsimile: 646-964-6667
rb@mandelbhandari.com
em@mandelbhandari.com

*Counsel for Plaintiff United Food and
Commercial Workers Union and
Participating Food Industry
Employers Tri-State Pension Fund*

FINE, KAPLAN AND BLACK, R.P.C.
ROBERTA D. LIEBENBERG
ADAM PESSIN
One South Broad St., Suite 2300
Philadelphia, PA 19107
Telephone: 215-567-6565

Facsimile: 215-568-5872
rliebenberg@finekaplan.com
apessin@finekaplan.com

-and-

MOTLEY RICE LLC
WILLIAM H. NARWOLD
DONALD A. MIGLIORI
MICHAEL M. BUCHMAN
JOHN A. IOANNOU
600 Third Avenue, Suite 2101
New York, NY 10016
Telephone: 212-577-0040
Facsimile: 212-577-0054
bnarwold@motleyrice.com
dmigliori@motleyrice.com
mbuchman@motleyrice.com
jioannou@motleyrice.com

-and-

MILLER LAW LLC
MARVIN A. MILLER
MATTHEW VAN TINE
115 S. LaSalle St., Suite 2901
Chicago, IL 60603
Telephone: 312-332-3400
Facsimile: 312-676-2676
mmiller@millerlawllc.com
mvantine@millerlawllc.com

Of Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be e-mailed to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 12, 2018.

/s/ Michael D. Hausfeld

MICHAEL D. HAUSFELD

HAUSFELD LLP

1700 K Street, Suite 650

Washington, DC 20006

Telephone: 202-540-7200

Facsimile: 202-540-7201

Email: mhausfeld@hausfeld.com